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July 22, 2025

VIA ELECTRONIC FILING

Magistrate Judge Peggy Kuo
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 11C South
Brooklyn, New York 11201

Re: Joint status letter and consent motion for the extension of deadlines.

Michael Edwards v. Stern & Stern, P.C. (1:24-cv-08137-PK)

Dear Judge Kuo:

The undersigned represents Plaintiff in this FDCPA lawsuit.

The relevant procedural history of the case is as follows. On January 30, 2025, the court entered a scheduling order [DE 22]. On March 7, 2025, Defendants' original counsel filed a motion to substitute [DE 28]. On February 20, 2025, attorney Arthur Sanders filed a notice of appearance [DE 26]. On May 7, 2025, Mr. Sanders filed a letter notifying the court and the parties that the insurance carrier would proceed with him as counsel [DE 30].

Today is the deadline for the Parties to, *inter alia*, file a status report certifying the close of fact discovery. I write on behalf of all Parties to request an extension of the deadline for the close of fact discovery and the deadline to request a pre-motion conference or file a briefing schedule for dispositive motions. Pursuant to Your Honor's January 30, 2025 Scheduling Order [DE #22], these deadlines are today. The parties request an extension until October 22, 2025.

The reason for the extension is that fact discovery is ongoing and incomplete. Defendants' current counsel only appeared in this action on February 20, 2025. Defendants have responded to Plaintiff's April 9, 2025 discovery requests, but have not responded to emails from Plaintiff's counsel, identifying deficiencies in Defendants' responses, with either production of the requested items or objections to the requests. If those deficiencies are not cured, Plaintiff anticipates filing a motion to compel. Further, Defendants have noticed Plaintiff's deposition for August 19, 2025.

This is the first request for an extension of this deadline. The extension would affect deadlines related to filing of pre-motion conference regarding summary judgment and certifying the completion of fact discovery. Those deadlines are today. The Parties request a 90 day extension to October 22, 2025 for those deadlines.

Today is also the deadline to indicate whether expert discovery is needed. The parties do not expect that expert discovery will be required in this case.

Respectfully,

/s/

Ahmad Keshavarz

cc: Arthur Sanders via ECF